

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B294229574

FACILITY: Consumers Energy Gaylord Combustion Turbine Plant		SRN / ID: B2942
LOCATION: 201 Murner Rd., GAYLORD		DISTRICT: Gaylord
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT: Tim Fuller, Supervisor		ACTIVITY DATE: 05/29/2015
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On May 29, 2015, I inspected the Consumers Energy Gaylord Combustion Turbine facility. Mr. Timothy Fuller, the supervisor, showed me around. I did not find any violations of Renewable Operating Permit MI-ROP-B2942-2013 or of Air Quality Rules.

Mr. Fuller reported that the plant has not operated since September of 2014. It is mothballed. This means that the plant is kept up such that it should be able to resume operation within 90 days after they receive the word to go ahead.

Mr. Fuller told me that mothballing a plant is usually the first step toward closing it. First Consumers Energy would keep the plant mothballed for three years. During this period the plant is kept complete, ready to start up again within 90 days. If they should need parts to keep another plant operating, they can't take those parts from the mothballed plant. After that, the plant would be decommissioned for another three years. When that time is completed it would be possible to demolish it.

However, in the case of the Gaylord Combustion Turbine plant they expect the plant to return to service. Mr. Fuller expects this would be sometime early in 2016. Consumers Energy expects to decommission some older coal-fired plants around that time. They expect to need more peaking capacity then, so it will make sense to return the Gaylord plant to service.

The plant appears unchanged from previous inspections. As described in previous reports including CA_B294222504, the plant consists of:

- Four General Electric simple cycle turbines with 268 million BTU per hour heat input, designated as Units 1-4
- One inoperative Pratt and Whitney simple cycle turbine with 234 million BTU per hour heat input. This unit has been broken down for several years; it has never been operable at any time I have inspected the plant, going back over a decade, and it has never been included in any of the Renewable Operating Permits for this plant.
- Two small diesel engines, one each on Units 1 and 2. These are truck-sized engines used to start the units. Units 3 and 4 have electric starters.
- Two 9-gallon diesel fuel tanks, one for each of the starter engines on Units 1 and 2
- One large diesel fuel tank which has been decommissioned and is disconnected from the plant. At one time the turbines could run on diesel fuel oil, but this has not been possible at any time I have inspected the plant.

Table FGCOMBTURBS, Condition VI.1, requires recording the type and quantity of fuel burned in the combustion turbines. In past inspections this information was being kept, but I chose not to ask for copies of the relevant records this time as no fuel has been burned this year. Mr. Fuller told me the data system hasn't been changed and the data will be available when the plant restarts.

Table FG CI RICE MACT, Condition III.1, requires oil changes each 500 hours of operation, air filter inspection each 1000 hours, and belt and hose inspections each 500 hours or annually with inspections as necessary. Mr. Fuller said that as the engines haven't run Consumers is changing oil, inspecting, and maintaining them once a year.

Mr. Fuller mentioned he understood Consumers could analyze the oil rather than change it. In this he is correct; this alternative is allowed by Condition III.2 of FG CI RICE MACT Table. He says the amount of

oil is too small to make this worthwhile, so they just change it.

The fuel gas for the plant is shut off at the gas supply valves, which are just outside the plant property. Mr. Fuller says they are turning the turbines from time to time to circulate the oil, but none of the equipment has actually operated since last September.

NAME William J Rogers Jr

DATE 5/28/2015

SUPERVISOR 